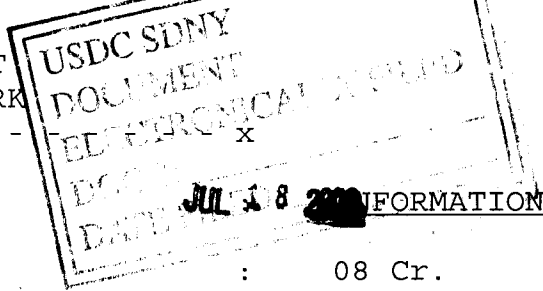


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

-v.-

: 08 Cr.

BONNIE DICK,

:

Defendant.

:

COUNT ONE

(Conspiracy To Commit Wire Fraud)

1. From at least in or about 2001, up to and including in or about 2004, in the Southern District of New York and elsewhere, BONNIE DICK, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, to violate Section 1343 of Title 18, United States Code.

2. It was a part and an object of the conspiracy that BONNIE DICK, the defendant, and others known and unknown, unlawfully, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, a writing, sign, signal, picture and sound for the purpose of executing such

scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, DICK knowingly administered several fraudulent loan investment programs in which investors were solicited to make investments with false promises of high, guaranteed rates of return.

(Title 18, United States Code, Section 1349.)

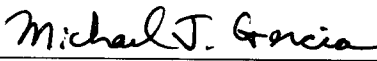
COUNT TWO

(Wire Fraud)

3. From in or about 2001, up to and including in or about 2004, in the Southern District of New York and elsewhere, BONNIE DICK, the defendant, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, unlawfully, willfully and knowingly did transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce, writings, signs, signals and sounds for the purpose of executing such scheme and artifice, to wit, DICK knowingly administered several

fraudulent loan investment programs in which investors were solicited to make investments with false promises of high, guaranteed rates of return.

(Title 18, United States Code, Sections 1343 and 2.)



MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

BONNIE DICK,

Defendant.

INFORMATION

08 Cr. _____ (LAP)

(Title 18, United States Code, Sections
1343, 1349, and 2)

MICHAEL J. GARCIA
United States Attorney
